

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

ANDREY BUYNOVSKIY

)

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) Criminal Action No.: 02-30043-MAP

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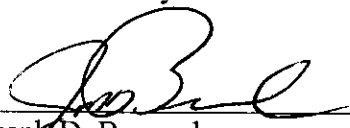
MOTION TO BRING FORWARD FOR CHANGE OF PLEA

The Defendant, Andrey Buynovskiy, respectfully requests this honorable court to bring the above-mentioned matter, scheduled for Trial on November 28, 2005, forward for the following reasons:

1. The Defendant wishes to change his plea on the above-mentioned matter.

Wherefore, the Defendant respectfully requests this Honorable Court bring his case forward for a change of plea as the interests of justice would be served by the granting of the Defendant's request. The Defendant has attached an affidavit in support of the foregoing motion.

Respectfully Submitted,
Andrey Buynovskiy
By His Attorney:


Joseph D. Bernard
The Law Offices of Joseph D. Bernard, P.C.
73 State Street, Suite 301
Springfield, MA 01103
(413) 731-9995
BBO#: 557986

Date: November 18, 2005

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

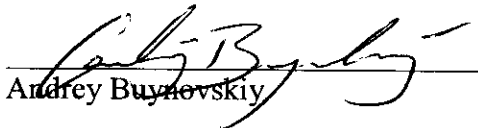
UNITED STATES OF AMERICA)
)
v.) Criminal Action No.: 02-30043-MAP
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ANDREY BUYNOVSKIY)

AFFIDAVIT IN SUPPORT OF MOTION TO BRING FORWARD FOR CHANGE OF
PLEA

Under oath I depose and state:

1. I, Andrey Buynovski, am the Defendant in the above-mentioned matter.
2. On November 18, 2005, I met with a Russian interpreter—Veronica Malek—and my attorney, Joseph D. Bernard.
3. Upon the advice and consent of my counsel, Attorney Bernard, and with a free and clear mind I decided to change my plea in the above matter.
4. All aspects of the case were discussed and interpreted to me in Russian, my first language.
5. This affidavit was read, and translated to me in Russian, by Veronica Malek.

SIGNED UNDER THE PAINS AND PENALTIES OF PERJURY THIS 18TH DAY OF
NOVEMBER, 2005.


Andrey Buynovski

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**


UNITED STATES OF AMERICA)
)
v.)
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ANDREY BUYNOVSKIY)

Criminal Action No.: 02-30043-MAP

CERTIFICATE OF SERVICE

I hereby certify that I served a copy of the foregoing Motion to Bring Forward with Supporting Affidavit by Hand Delivery, this 18th day of November, 2005 on:

Assistant United States Attorney
Kevin O' Reagan
U.S. Attorney's Office
1550 Main Street, Room 310
Springfield, MA 01103



Joseph D. Bernard
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